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*Attorneys for Defendants*  
*Essential Consultants, LLC and Michael Cohen*

10 UNITED STATES DISTRICT COURT  
11 CENTRAL DISTRICT OF CALIFORNIA

12 STEPHANIE CLIFFORD a.k.a.  
13 STORMY DANIELS a.k.a. PEGGY  
14 PETERSON, an individual,

15 Plaintiff,

16 v.

17 DONALD J. TRUMP a.k.a. DAVID  
18 DENNISON, an individual,  
19 ESSENTIAL CONSULTANTS, LLC,  
20 a Delaware Limited Liability  
21 Company, MICHAEL COHEN, an  
22 individual, and DOES 1 through 10,  
23 inclusive,

24 Defendants.

Case No. 2:18-CV-02217-SJO-FFM

**DECLARATION OF BRENT  
H. BLAKELY IN SUPPORT  
OF DEFENDANT MICHAEL  
COHEN'S OPPOSITION TO  
PLAINTIFF'S MOTION TO  
AMEND COMPLAINT**

Assigned to the Hon. S. James Otero  
Action Filed: March 6, 2018

Date: December 3, 2018  
Time: 10:00 a.m.  
Location: 350 West 1<sup>st</sup> Street  
Courtroom 10C, 10<sup>th</sup> Floor  
Los Angeles, CA 90012

**DECLARATION OF BRENT H. BLAKELY**

I, Brent H. Blakely, declare:

1. I am an attorney duly licensed to practice before all courts of the State of California and in the U.S. District Court for the Central District of California, among other courts. I am a partner of the law firm of Blakely Law Group, counsel of record for Defendant Essential Consultants LLC and Michael Cohen. I make this declaration based on my own personal knowledge and, if called and sworn as a witness, I could and would competently testify hereto.

2. Attached hereto as **Exhibit 1** is a true and correct copy of a letter dated October 25, 2018 from Senator Charles E. Grassley, Chairman, Committee on the Judiciary, to The Honorable Jeff Sessions and The Honorable Christopher A. Wray.

3. Attached hereto as **Exhibit 2** is a true and correct copy this Court's Order dated October 15, 2018 granting Donald Trump's Anti-SLAPP motion in *Clifford v. Trump*, case No. 18-06893.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the order Granting Motion to Dismiss with Leave to Amend and Deferring Consideration of Special Motion to Strike in *Verizon v. Covad*, USDC Northern District of California, case No. 01-20524.

5. Attached hereto as **Exhibit 4** is a true and correct copy of an article from the Los Angeles Times dated October 22, 2018, entitled Michael Avenatti is hit with a \$4.85 million judgment for unpaid debt as court orders eviction of his law firm, which can be found at <http://www.latimes.com/politics/la-na-pol-avenatti-eviction-20181022-story.html>

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1 I declare under penalty of perjury under the laws of the United States of  
2 America that the foregoing is true and correct.

3 Executed on November 13, 2018, at Los Angeles, California.

4 /s/ Brent H. Blakely

5 BRENT H. BLAKELY